Draft Ingress II

PHASE I
ENVIRONMENTAL ASSESSMENT
CHICAGO, ILLINOIS

Prepared for

MARKTILL CORPORATION
Chicago, Illinois

Prepared by

ROY F. WESTON, INC.
Three Hawthorn Parkway
Vernon Hills, Illinois 60061

July 1992

Work Order No. 9049-01-01

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PROJECT PARTICIPANTS

The following members of the staff of Roy F. Weston, Inc. have participated in the planning and execution of this project and preparation of this report:

R. Randolph Ferguson	Project Director
Joan M. Dunn	Technical Manager
Russell W. Stephens	Graphics Supervisor
Anne M. Potter	Senior Word Processing Operator

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SECTION 1
INTRODUCTION

During the weeks of 15 and 20 July 1992, Roy F. Weston, Inc. (WESTON®) completed a Phase I environmental assessment of the property located at 1000 West 120th Street, Chicago, Illinois (hereinafter referred to as PROPERTY). The site is currently occupied by Marktill Corporation-Ingersoll Products where agricultural disc blades are manufactured.

The assessment was conducted on behalf of Marktill Corporation. It is WESTON's understanding that Marktill AM Corporation is reviewing the aforementioned PROPERTY prior to refinancing.

The objective of the assessment was to identify actual and potential major environmental liabilities associated with current and historical operations completed on site, and the present physical condition of the building and surrounding property. The assessment was conducted by Ms. Joan Dunn, Technical Manager for WESTON. Messrs. Geoffrey Eysenbach, Director-Industrial Relations, Joe Saternus, Manager-Engineering, Robert Szucs, Vice President-General Manager, and Jack Woodruff, Vice President Administration for Marktill Corporation provided information to WESTON relative to the PROPERTY. Messrs. Eysenbach and Saternus accompanied WESTON during the PROPERTY inspection.

The environmental assessment included an on-site inspection conducted on 15 July 1992 to assess the PROPERTY for evidence of hazardous material handling practices which have the potential to adversely impact the environmental condition of the PROPERTY. The assessment also included discussions with the City of Chicago Permits, Building and Zoning, and Water Departments, a search of historical Sanborn Fire Insurance maps, and a review

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of regulatory databases provided by Vista Environmental Information, Inc. (Vista), as identified below.

- United States Environmental Protection Agency (U.S. EPA) Comprehensive Environmental Response Compensation and Liability Act (CERCLA), National Priority List (NPL).
- U.S. EPA Facility Index System (FINDS) database - Listing of any property or facility in which the U.S. EPA has investigated, reviewed or been made aware of in connection with its various regulatory programs (1991).
- U.S. EPA Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database - Listing of sites in which the U.S. EPA has or is currently investigating pursuant to CERCLA (1991).
- U.S. EPA Resource Conservation and Recovery Act (RCRA) database - Listing of facilities which have submitted notification of hazardous waste activity and includes hazardous waste generators, and treatment, storage, and disposal facilities (1991).
- U.S. EPA Emergency Response Notification System (ERNS) database - Listing of facilities which have reported releases of oil or hazardous substances (1991).
- U.S. EPA Open Dump database - Listing of facilities which do not comply with the U.S. EPA's criteria for classification as a solid waste disposal facility (1991).
- Illinois Environmental Protection Agency (IEPA) State Priority List - Listing of sites that have known environmental problems. Listing is compiled from a search of the IEPA state remedial action priorities list, voluntary cleanup list, and immediate removal sites list (1991).
- Illinois Fire Marshal's Underground Storage Tank list (IL UST list) - Inventory of reported USTs located within the state (1991).
- IEPA Solid Waste Facility Information database - Listing of sites available for disposal of solid waste (1991).

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- Consolidated Docket Enforcement Database - Compilation of civil, and judicial enforcement actions filed by the Department of Justice on behalf of the U.S. EPA, against violators of federal environmental statutes (1991).

- RCRA Administrative Action Tracking System (RAATS) database - Tracking of RCRA Section 3008 compliance orders and orders of consent for the Office of Waste Programs Enforcement, U.S. EPA (1991).

The assessment was conducted by WESTON personnel experienced in recognizing both short- and long-term environmental hazards and liabilities. This effort does not represent future site conditions and cannot preclude future environmental problems currently beyond the scope of this evaluation.

The assessment focused on the following environmental issues of concern as they relate to the PROPERTY:

- Air emissions and asbestos.
- Water and wastewater.
- Solid and hazardous wastes.
- Storage tanks and hazardous materials.
- Polychlorinated biphenyl (PCB) management.

A facility overview is presented in Section 2 of this report, and WESTON's observations and findings are in Section 3. WESTON's conclusions and recommendations are in Section 4, and disclaimers relevant to this assignment are presented in Section 5.

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SECTION 2
PROPERTY OVERVIEW

The subject PROPERTY is located in an industrial area approximately 10 miles southwest of Chicago's business district and 20 miles southeast of Chicago's O'Hare International Airport. The site is situated on the north side of west 120th Street, west of South Morgan Street, with access to Interstates 294 and 57 (Figure 2-1). According to the most recent Blue Island Quadrangle U.S. Geological Survey Topographic map, the site is located in the northeast 1/4 of Section 29, Range 14 East, Township 37 North of the Third Principal Meridian in Cook County, Illinois.

The PROPERTY is zoned M2-2, Manufacturing District, according to the City of Chicago's Zoning Department records (Appendix B), and is identified as in the Standard Industrial Code (SIC) No. 3714, Motor Vehicle Parts and Accessories.

2.1 PROPERTY DESCRIPTION

The PROPERTY comprises 24.53 acres and includes 619,107 square feet of buildings and roofed areas, and 449,394 square feet of parking lot and yard areas (Figure 2-2). PROPERTY development began in 1893 when the original buildings on the east side along 120th Street were constructed, with structures added up until 1965. Offices are currently located in buildings 111 through 114 (east side), manufacturing is conducted on the northwest side (buildings 912 through 925), with the remaining buildings used for storage, warehousing and shipping. Buildings 914 through 916 houses the former heating system boilers and related equipment, and building 1024 is a paint and oil storage structure. The majority of buildings are sprinklered for first line of defense in case of fire. A fire water tank is situated on the southwest corner. Employee parking is provided across West 119th Street as shown on the Site Plan, Figure 2-2.

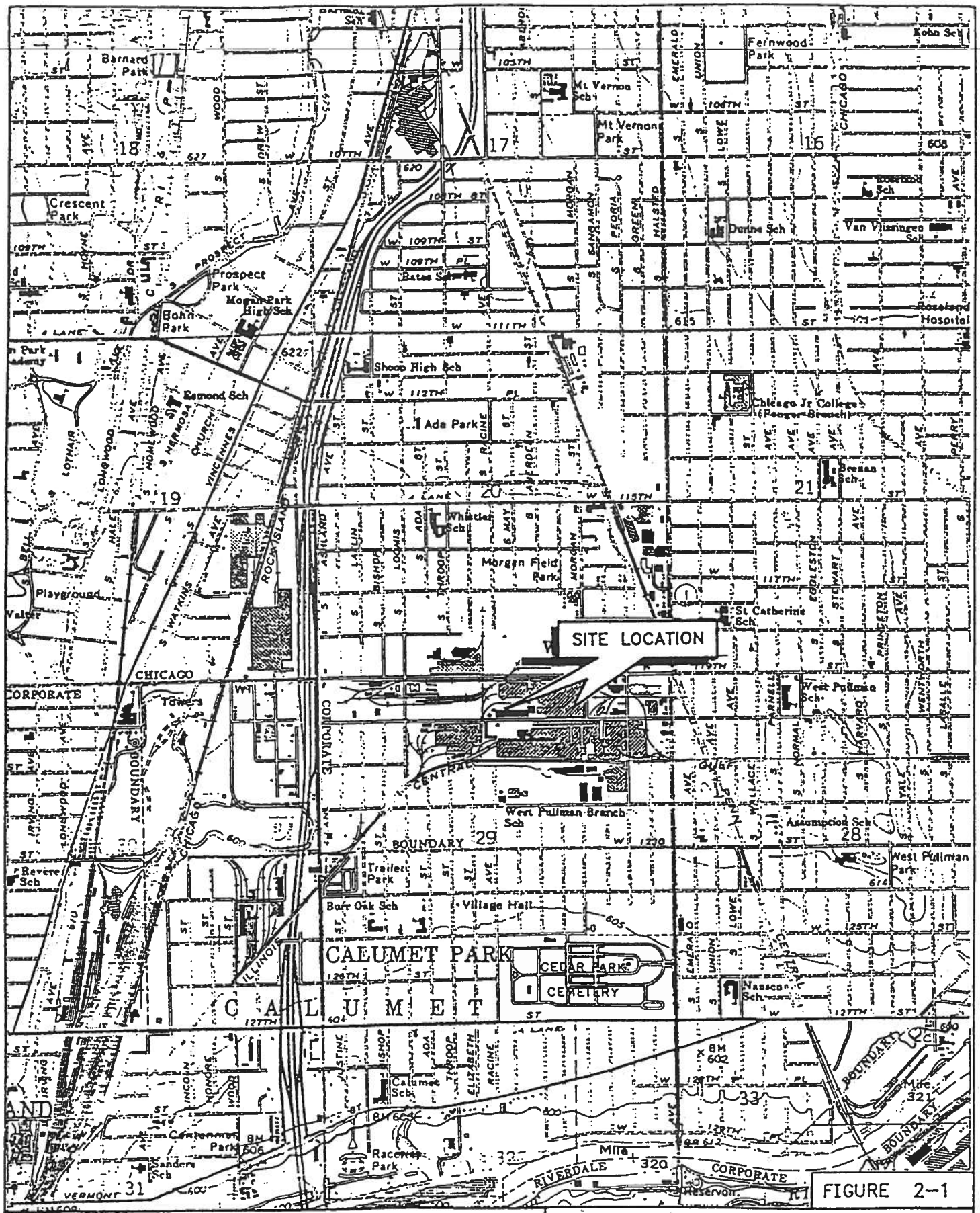

FIGURE 2-1

WESTON MANAGERS DESIGNERS/CONSULTANTS

Three Hawthorn Parkway
Vernon Hills, Illinois
60061

SITE LOCATION MAP

1000 WEST 120th STREET
Chicago, Illinois

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The PROPERTY is served by all Chicago utilities and services, and is not located in a HUD-designated flood hazard area. Utilities are provided through a site Commonwealth Edison electric substation (buildings 811 and 812), Peoples Gas, and Illinois Bell Company. The site is serviced by City of Chicago water and a combined Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) sanitary and storm water system.

2.2 PROPERTY OWNERSHIP/HISTORY

According to information obtained and reviewed by WESTON, the PROPERTY has a history of industrial use as early as 1897 when it was used by Whitman and Barnes Manufacturing Company to make lawnmowers and haymaking tools. The site has a history of industrial machining and oil use for some 90+ years.

Borg-Warner purchased the PROPERTY in 1929, and in that same period, acquired Ingersoll Steel Disc Division, manufacturer of agricultural accessories including disc blades. According to former Borg-Warner employees, Messrs. Eysenbach, Saternus, and Szucs, electronic enclosures, hospital beds, bathtubs and sinks were also manufactured on site. During the Korean conflict, wing tanks were built, and during Vietnam bomb shell casings were made on the PROPERTY. According to a 1975 Sanborn Fire Insurance map, an electromelt foundry was operated in building 1018 where steel was manufactured. The former foundry building is now used as storage space.

According to an October 1984 news release provided by Marktill Corporation, the Ingersoll Products Division was sold by Borg-Warner in 1980 to a private operating group, Hammond, Kennedy, and Associates. In 1986, Marktill AM Corporation purchased Ingersoll Products and the 1000 West 120th Street property.

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2.3 SANBORN FIRE INSURANCE MAPS

Sanborn maps were obtained by WESTON for 1897, 1911, 1950, 1975, and 1991. The 1897 map shows the eastern half of the PROPERTY developed with Whitman and Barnes Manufacturing Company on site. Admittance into the buildings was refused. The 1911 map identifies the Whitman and Barnes lawnmower and haymaking tools manufacturing operations. Woodworking, annealing, grinding, tempering, and polishing of steel was conducted on the site. Two underground tanks of fuel oil are shown on the north-central side, one gas oil underground tank on the northeast side, and an oil storage building on the southeast side.

The 1939 Sanborn map shows the site as Ingersoll Steel Disc Division of Borg-Warner Corporation. Processes include a forge shop, metal stamping, cooling, grinding, polishing, painting, pickling, and enameling. Coal storage tanks are shown outside the boiler room, an oil storage building is situated on the north-central side, furnaces shown on the northwest side, and an aboveground oil storage tank is located in the open area of the west-central portion of the site. The 1950 map shows similar operations and storage as identified above. In addition, two sulfuric acid tanks have been added, one on the northeast side and one adjacent to the boiler room.

The 1975 Sanborn map shows the addition of a paint storage vault on the south-central portion, building 1024, and the electromelt foundry building with two furnaces on the southwest side of the PROPERTY. The 1991 map shows operations and storage areas as noted above.

2.4 SURROUNDING PROPERTY USE

During WESTON's assessment, a windshield survey of surrounding properties was conducted whereby facility type and condition was noted. The objective was to identify sources of

stored materials which could adversely impact the subject PROPERTY. Surrounding areas are a mix of industrial, commercial, and institutional. The PROPERTY is bordered:

- Across West 119th Street, to the north, by Heat Treating Corporation.
- Across South Morgan Street, to the east, by Tri-State Die and a scrap metal yard.
- Across West 120th Street to the south, by the former International Harvester West Pullman Works, which has been demolished and building debris remains.
- To the east of the International Harvester site by the former National Lead Company.
- To the west by the Christ Universal Temple property.

According to Marktill representatives, the National Lead Company site was the subject of environmental studies for lead residuals in soils on site, and International Harvester for asbestos building debris remaining on the property.

2.5 AGENCY INFORMATION REVIEW

WESTON reviewed the regulatory databases provided by Vista as described in Section 1 of this report. There are no facilities identified within a 1-mile radius of the PROPERTY on the U.S. EPA NPL for remediation, or open dumps on the database. For zip code 60643, there are eight CERCLIS sites named. The National Lead site (Carter White Lead NL IND, ILD980265797) at 12042 South Peoria Street, and International Harvester (ILD005213285) at 1015 West 120th Street are within 1/4-mile of the PROPERTY. These sites were investigated by IEPA, investigations have been completed, and neither site has been proposed for the final NPL. No final determinations as to classification have been made. Three properties were identified on the ERNS list for releases of hazardous materials. The Calumet Heat Treat Company, at 12139 South Peoria Street, within 1/2 mile of the PROPERTY, had a release of petroleum to groundwater.

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The State Report identifies no solid waste facilities within the area or lists any hazardous material spills. There are numerous underground storage tanks identified for zip code 60643.

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SECTION 3
PRESENT SITE CONDITIONS

Operations currently conducted on site include steel rolling, blanking, piercing, stamping, hot forming, heat-treating, and painting in the manufacture of agricultural disc blades. Cooling water and oils are recycled during the processes.

Environmental issues reviewed by WESTON, as related to the PROPERTY, are detailed in the following subsections.

3.1 AIR EMISSIONS AND ASBESTOS

3.1.1 Air Emissions

Air emission permits issued to Ingersoll Products have included the paint spray booth with washwater, drying ovens, heat-treat furnaces, soaking pits, grinders with rotoclones, shot blasters with baghouses, slab rolling with baghouses, the electronic cabinetry line, and boilers. Permits for operations currently conducted expire in October 1993. Another permit recently issued is for a paint hood incinerator, issued in March 1992 and due to expire March 1997. No special conditions relative to the permits have been issued by the City of Chicago. An Episode Action Plan relative to air emissions to be followed should a red alert be identified was developed by Ingersoll and submitted to the City of Chicago.

Manufacturing areas are no longer heated by the PROPERTY boilers. Ceiling-hung gas-fired and electric heaters are used. Offices are heated via two gas-fired furnaces and cooled by window air conditioning units. These units do not require special permits.

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3.1.2 Asbestos

During the on-site inspection, WESTON did not conduct a formal asbestos assessment of the buildings. WESTON did, however, attempt to determine the potential for asbestos-containing materials (ACM) to have been used during construction. Based upon observations made during the site inspection, as well as the age of the building, it is WESTON's opinion that there may be significant ACM within the buildings as suspect pipe wrap and the elbow insulating materials were observed throughout, as well as thermal insulation on tanks, vinyl floor tiles, acoustical ceiling tiles, and building 713 ceiling material. There may also be ACM within the buildings which WESTON was unable to observe such as wall and roofing insulation, mastic beneath the floor tiles, and in the boilers. Building specifications were not available at the time of inspection to confirm or refute the presence of asbestos in building materials identified above.

3.2 WATER AND WASTEWATER

There are no potable water wells on the PROPERTY. Potable water is supplied through the City of Chicago from Lake Michigan. According to previous discussions with the city's laboratory personnel, the City of Chicago's municipal supply meets federal and state drinking water standards.

Wastewater generated on site which enters the MWRDGC sanitary sewer system includes non-manufacturing effluents from restrooms, sinks, and drinking fountains, and industrial wastewater streams from disc washers, cooling tanks on heat-treat lines, cooling and descaling water in the slab rolling mill, and clarifiers on the cooling pond. Waste streams include residual oils (not skimmed off), grease, and steel scale. It is estimated that discharge is 90,000 gallons per day. The MWRDGC monitors wastewater effluent discharge on a regular basis.

The MWRDGC issued a notice of violation No. 91-1103S to the facility on 17 June 1992 for exceeding the limitation guideline for oil and grease. Ingersoll Products' personnel state that the situation was rectified. The oil skimmer on the cooling pond is no longer operational and should be replaced or repaired to reduce oil residuals that might be exiting the PROPERTY through the clarifier. The oil skimmer in the heat-treat line area should be maintained to reduce the possibility of oil residuals exiting via the cooling tanks on the heat-treat lines.

There are no National Pollutant Discharge Elimination System (NPDES) permits issued for the PROPERTY. Stormwater and roof drain runoff from the PROPERTY is directed into the MWRDGC combined sanitary storm sewer system. Practices observed by WESTON which may contribute to elevated oil and grease in wastewater effluent into the combined sanitary-storm sewer system are as follows. Oil residuals were observed adjacent to the paint storage building, may remain on scrap steel destined for recycling, and may be contained drums observed to be leaking on the west and northwest side.

3.3 SOLID AND HAZARDOUS WASTES

Solid nonhazardous waste generated on site includes paper, plastic, corrugated, wood, etc. This material is collected and stored in the open area on the center of the PROPERTY until removal through contract service with Panozzo to a municipal landfill. Other solid industrial waste streams generated, which have been tested using U.S. EPA Toxicity Characteristic Leachate Procedure (TCLP) and were determined to be nonhazardous through Environmental Monitoring and Technologies, Inc. of Morton Grove, Illinois. These wastes have been removed from the site as Illinois special waste through Able Disposal Company to Land and Lakes Landfills. The wastes include quench and weir tank residuals, air pollution control dust from baghouses, burning bed shaker slag, spray pond sludge, heat-treat furnace sludge, mill pit scale, mill dust (baghouse), and furnace sludge. Waste disposal

permits expired in 1991. Waste streams need to be re-tested before new industrial waste permits are issued.

Scrap steel is stored outside on the central section of the PROPERTY until removal for recycling through scrap dealers. The steel has oil residuals remaining which may have caused some soil contamination over the years.

Waste hydraulic oils are collected into sump pits. A recycler now comes on site, and recycles the oil for reuse in the manufacturing processes. Quench oil used in heat-treating is skimmed off from cooling water, collected into a below-grade holding tank, and reused in the heat-treat process. Gear oil is recycled through an oil company. Previously waste oils were sold to an oil recycler.

According to Ingersoll Products personnel, the only hazardous wastes generated on site requiring off-site disposal has been solvent-based paint and thinner residuals. This material was collected into drums, 34 of which were removed by Ashland Chemical (17,000 gallons) to be used in industrial fuels. A certificate of destruction and manifest are on file. The same hazardous waste generator number, ILD082079054, which the U.S. EPA has identified for Borg-Warner Ingersoll Products Division, was used for the shipment. Marktill Corporation should obtain a permit under their company name for future shipments.

Based on analytical results of the solid industrial waste streams and amounts of paint and thinner residuals generated, Marktill management will need to determine their hazardous waste generator status, generator or small generator. A small generator is one that generates less than 1,000 kilograms (2,200 pounds) in a one month period. A generator of hazardous wastes collectively accumulates in excess of 1,000 kg/mo. Based on generator

status, appropriate emergency contingency plans may require development and implementation following U.S. EPA Code of Federal Regulations (CFR) 40 , Parts 260-270.

3.4 STORAGE TANKS AND HAZARDOUS MATERIALS

3.4.1 Storage Tanks

There are currently three known USTs on the PROPERTY. One oil holding UST below grade is situated in the heat-treat area, Department 37 (Figure 2-2, Photographs-Appendix A). Two fuel oil tanks are located below the boiler room behind a brick wall with concrete walls and sand covering. The capacity of the USTs, contents, and condition are not known. According to the 1911 Sanborn map, two fuel oil USTs and one gas oil UST had been installed on the north side of the PROPERTY. No information was available as to the removal of these USTs as City of Chicago records do not predate the late 1930s.

There are two 10,000-gallon quench oil aboveground storage tanks (ASTs) on site on the north side. A 200,000-gallon fuel oil AST, which had been used and now only contains residuals, is situated on the southwest side in an earthen-diked area. Spillage and/or staining was observed in both areas. According to 1950 and 1975 Sanborn maps, an oil AST was situated north of the paint storage building on the central open section of the PROPERTY. The year that this AST was removed is not known as it erroneously appears on the 1991 Sanborn map. There were also two sulfuric acid ASTs on site, at the northeast corner where a crib remains and adjacent to the boiler room.

According to City of Chicago permit records, the following tanks had been installed or removed from the PROPERTY (Appendix C):

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Date	Capacity (gallons)	Contents	Permit No.
8-14-47 installed	(1) 200,000	Fuel oil	A 07969
11-9-55 installed	(1) 1,000	Propane	B 183620
10-31-57 installed	(1) 10,000	Fuel oil	B 228390
5-13-59 enclosed	(2) 25,000	Fuel oil	B 259347
4-21-65 removed	(1) 1,000	Gasoline	B 359130

REMOVED

There may be USTs remaining on site or contamination resulting from UST or AST use.

3.4.2 Hazardous Materials

Hazardous materials currently used on site include solvent-base paints and paint thinners of xylene, 1,1,1-trichloroethane, and dichloromethane. The thinners are mixed into paints and used up or evaporated, unless a bad mix occurs requiring disposal.

Paints, thinners, and 55-gallon drums of oil are stored in the paint storage building (1024). The building is equipped with non-sparking utilities, is sloped below grade to contain spills, and is secured. Some small containers of thinners were observed which are no longer used, could not be identified, and should be disposed following agency guidelines.

Quench oil used in the heat-treat process is stored in two 10,000-gallon ASTs. These ASTs are not diked and should be maintained and inspected for leakage on a regular basis. Because of the capacity of these oil tanks, Ingersoll should develop a Spill Prevention, Containment, and Countermeasure (SPCC) plan following U.S. EPA Clean Water Act requirements of 40 CFR, Part 112 - Oil Pollution Prevention.

There were two barrels of oxidizers stored adjacent to the former electric heat-treat process, that are no longer used. According to Mr. Eysenbach, this material is sodium nitrite.

Chemicals no longer required in production should be disposed of using agency and material safety data sheet guidelines.

Compressed gas cylinders of oxygen, acetylene, and other nonflammable gases are used and stored at the PROPERTY. Cylinders of oxygen and acetylene in use were observed strapped on a safety cart. Gas cylinders in the storage area were not all capped properly, or secured in an upright position as required. Acetylene (flammable) was stored in close proximity to oxygen cylinders. These should be segregated by a 20-foot distance or a 2-hour fire-rated separation wall.

Form "R" and Tier II registrations have been filed by management under U.S. EPA Superfund Amendments and Reauthorization Act (SARA, Title III), as required. Paints and thinners are identified as well as the liquid oxygen used to cut steel.

3.5 POLYCHLORINATED BIPHENYL (PCB) MANAGEMENT

Electricity is supplied to the PROPERTY via a Commonwealth Edison substation previously identified (building 811, 812) and underground cables. The substation is enclosed and secured. No other information is available relative to the cooling oils in the utility-owned transformers. From discussion with Commonwealth Edison, all PCB transformers (greater than 500 parts per million PCBs in coolant) have been replaced in the Chicago area over the past 10 years. There is the potential that these transformers could be PCB-contaminated; however, less than 500 ppm PCBs in unit coolants. If this information is needed, inquiries can be made directly to Commonwealth Edison who will charge for transformer testing. The utility maintains the equipment and will respond to a release should one occur.

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According to information provided by Ingersoll Product personnel, there are 17 transformers on the PROPERTY which are company-owned. Those observed by WESTON during the site inspection were secured by fencing, were not diked, and were not labeled as to PCB content. No staining was observed around the units viewed. There is no information relative to coolant contents for these units. Unless previously tested, the transformers could contain dielectric fluid contaminated with PCBs. Other electrical equipment observed within the buildings was of the dry-type and would not contain PCBs.

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SECTION 4
CONCLUSIONS AND RECOMMENDATIONS

Based on available information and WESTON's on-site observations, it is WESTON's opinion that the PROPERTY poses environmental concerns requiring further investigation. Environmental issues of concern are listed below:

- The potential exists that PROPERTY soils have been contaminated from oils stored on site and used in the manufacturing processes.
- The potential exists that petroleum product contamination remains in soils surrounding sites where fuel oil and gasoline USTs were located.
- The possibility exists that fuel oil and/or gas oil tanks remain on the PROPERTY.
- Suspect ACM is present within the buildings in the form of heating line pipe wrap and elbow insulation, thermal insulation wrap on tanks, acoustical ceiling tiles, ceiling materials, vinyl floor tile and mastic, and potentially other materials that WESTON was unable to observe.
- Because of the age of buildings, the possibility exists that site transformers may contain PCB dielectric fluid in quantities requiring labeling, maintenance, monitoring schedules, and spill cleanup procedures should a release occur.
- Foundry sands may have contaminated soils on the southwest side where steel had been manufactured.

4.1 STAINED SOIL AREAS

Staining was observed by WESTON during the PROPERTY inspection in several areas: on the southwest side surrounding the 200,000-gallon fuel oil tank, on the western side, near building 1101, on the northeast corner adjacent to the cooling pond, on the northern boundary near the quench oil tanks, and on the central open area adjacent to the paint storage building, and scrap steel and refuse storage areas. WESTON recommends the

collection of soil samples from the aforementioned areas for analysis to confirm or refute the presence of petroleum product contamination. Soils should be analyzed for benzene, toluene, ethylbenzene, and xylene (BTEX) components of petroleum and PCBs.

4.2 UNDERGROUND TANK SITES

WESTON recommends that soil samples be collected for BTEX in areas surrounding former fuel oil and gas oil tanks to confirm or refute the presence of petroleum product contamination. Borings should be advanced to below the estimated lower depth where the USTs were situated and discrete soil samples be collected for analysis using protocols required under the IEPA UST program.

4.3 USTs

Because there is no documentation relative to PROPERTY UST removal except for one 1,000-gallon gasoline UST in 1965, there may be USTs remaining on site as identified in the 1911 Sanborn Fire Insurance map. WESTON recommends a geophysical survey be completed in areas identified on the Sanborn map to identify any anomalous zones where an UST may be situated.

4.4 ASBESTOS

Because building finishing materials were manufactured prior to 1980 and construction occurred between 1897 and 1965, the potential exists that ACM was used in construction. WESTON recommends that a Phase I asbestos assessment be conducted by trained and certified building inspectors to identify all ACM within the building, document the condition of the ACM, and estimate the quantity. Bulk samples should be tested by an AIHA-accredited laboratory to confirm or refute the presence of asbestos.

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Identified ACM should be repaired or abated dependent upon condition, and remaining ACM should be managed and inspected under a facility asbestos operation and maintenance (O&M) plan. Prior to remodeling or demolition activities, affected building materials should always be analyzed for asbestos content. Floor tiles that are suspect ACM should never be sanded as asbestos fibers could be released.

4.5 TRANSFORMERS

PROPERTY transformers oils should be analyzed for PCBs to determine the unit status. The units should be appropriately labeled based on analytical results. Commonwealth Edison should be contacted to determine the status of transformer coolants within buildings 811 and 812.

4.6 FOUNDRY SOILS

Soils surrounding building 1018 should be collected and analyzed to confirm or refute that foundry operations caused soil contamination. Soils should be analyzed for phenols and metals.

4.7 COMPLIANCE ISSUES

While WESTON was not conducting an environmental compliance assessment, there were issues that WESTON observed requiring followup action as noted below:

- An SPCC plan should be developed and implemented to reduce the potential of contamination from oil handling and storage practices.
- Industrial waste streams should be analyzed to determine proper disposal methods either as an Illinois special waste or hazardous waste.
- Upon determination as to hazardous waste generator status, a permit number should be requested from U.S. EPA and IEPA under the name of Marktill Corporation-Ingersoll Product Division.

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- Hazardous materials no longer required in manufacturing operations should either be returned to vendors or be properly disposed.

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SECTION 5
DISCLAIMERS

The property evaluation is based on conditions existing 15 July 1992. Past conditions were considered on the basis of observations and readily available records, interviews, and recollections. WESTON cannot attest to the completeness and accuracy of the records and recollections. It is possible that past contamination remains undiscovered, or that conditions will change on the property in the future.

WESTON did not collect building material or environmental media samples for analysis. WESTON does not warrant or guarantee the property suitable for any particular purpose, or certify the site as "clean." Future regulatory modifications, agency interpretations, and/or policy changes may affect the status of the site.

Indoor air quality, radon, asbestos, wetlands, and fire specialty surveys were not requested as part of this project. These topics require specialized expertise; a specialty survey can be performed upon request.

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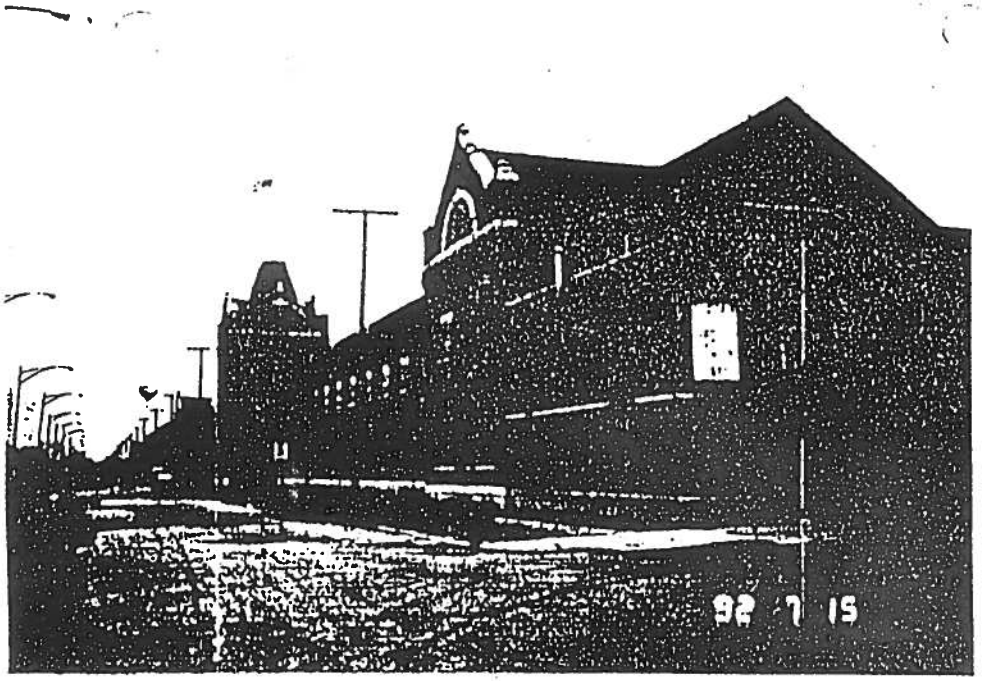
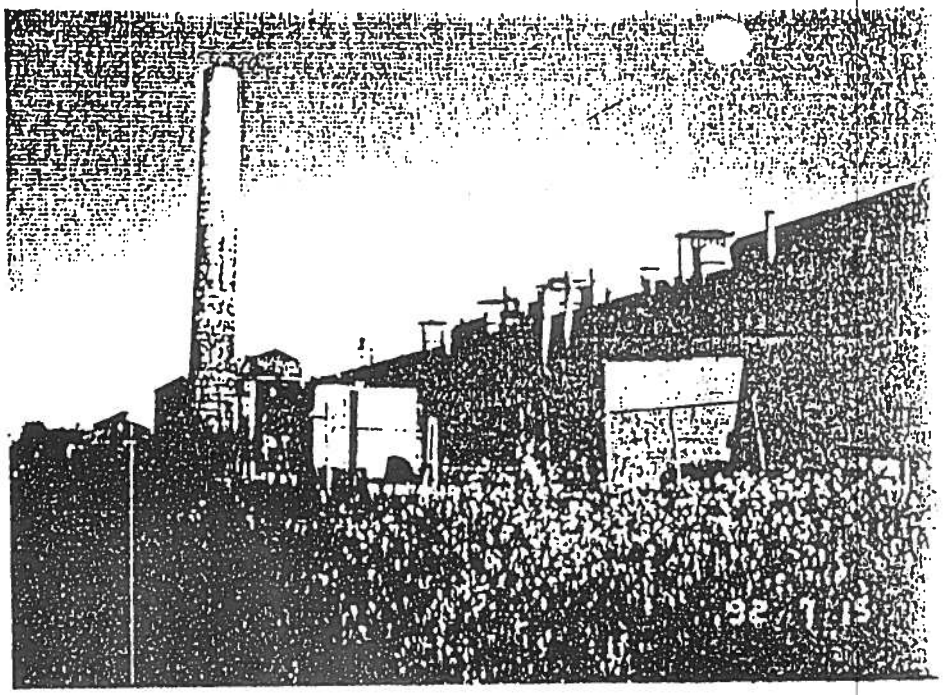
APPENDIX A

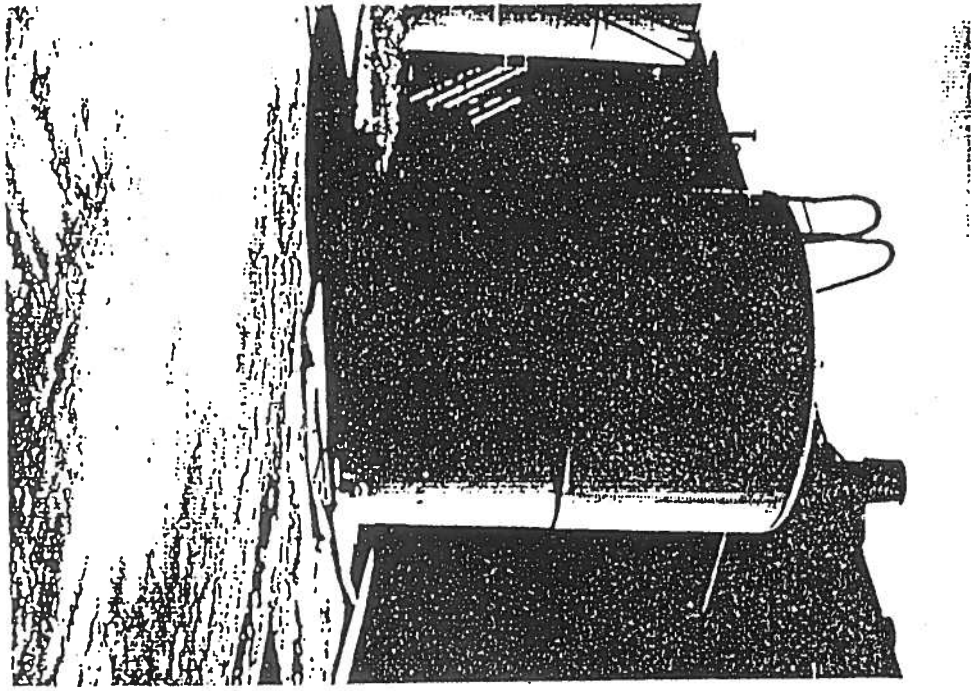
PHOTOGRAPHS TAKEN 15 JULY 1992



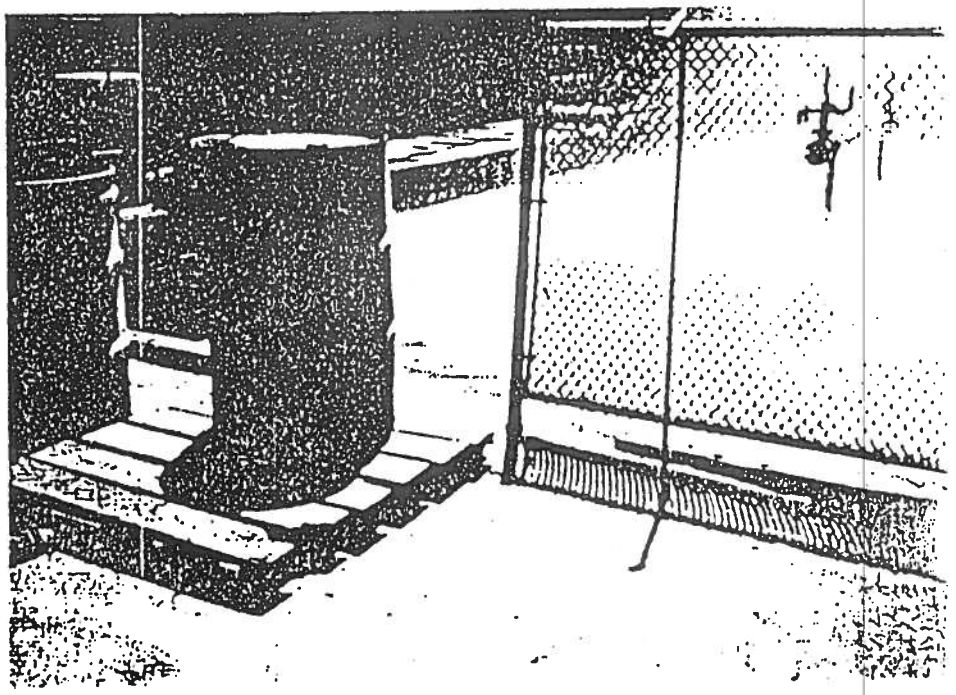
1000 WEST 120th STREET, CHICAGO, ILLINOIS
NORTHWEST VIEW



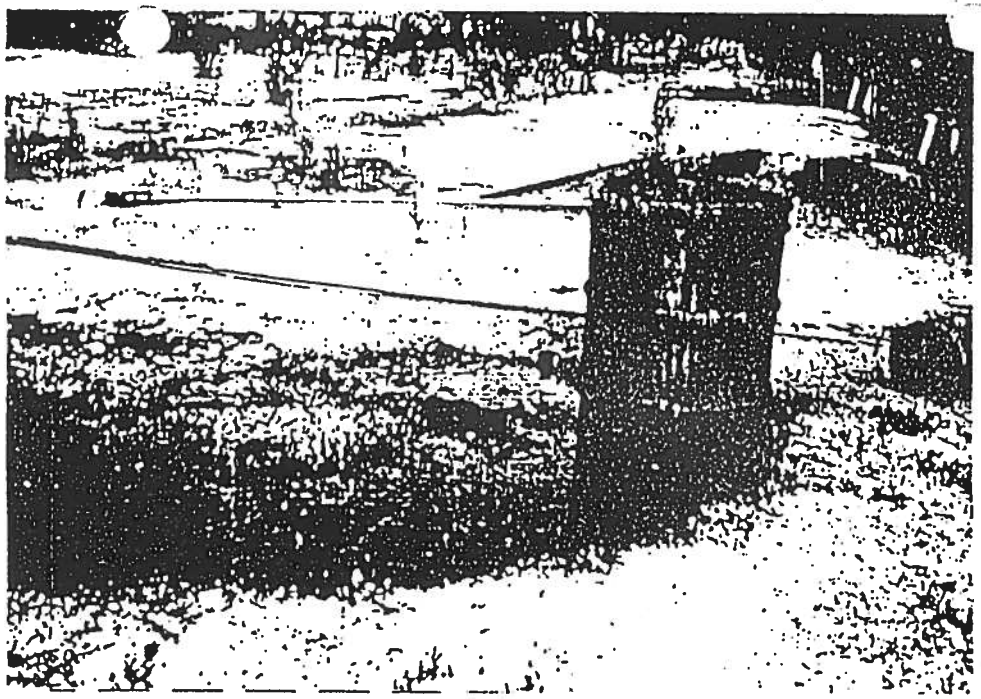
QUENCH OIL TANKS NORTH SIDE
SOUTHEAST VIEW



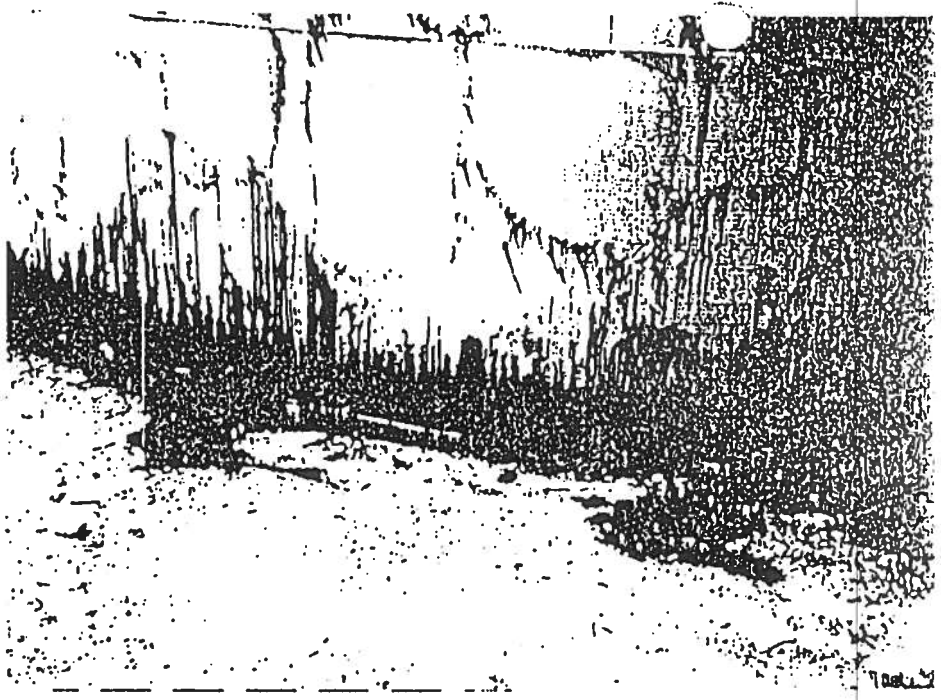
QUENCH OIL TANK
10,000 GALLON CAPACITY



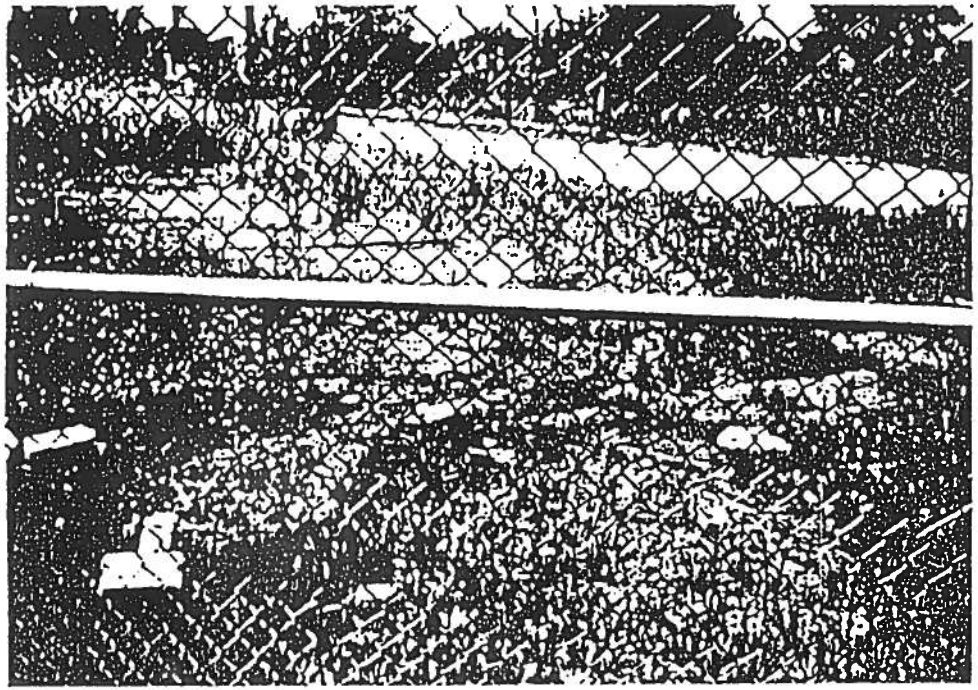
COOLING WATER POND
NORTHWEST SIDE



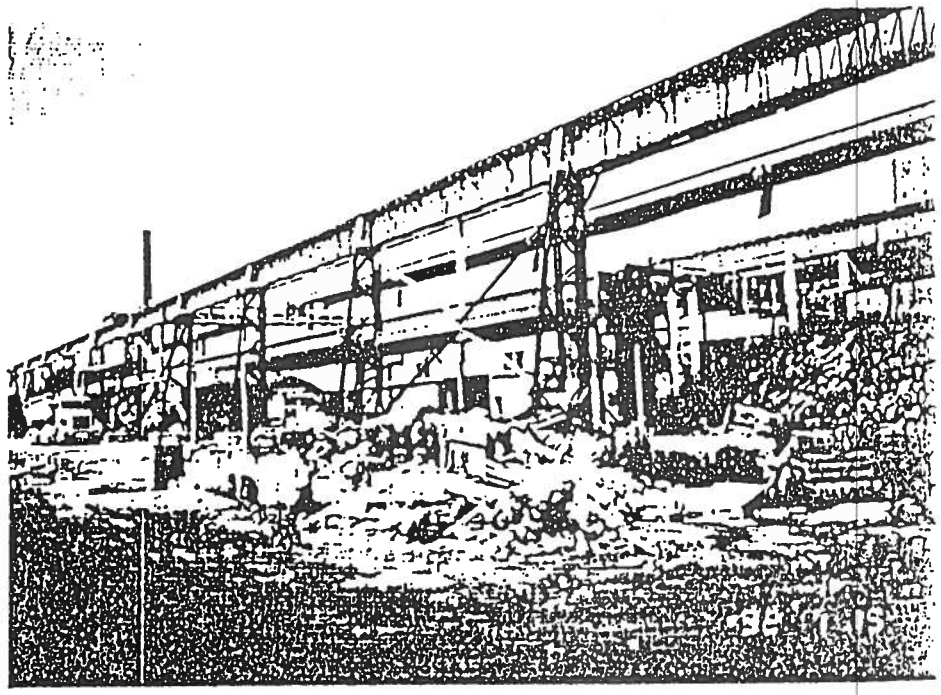
LEAKING PETROLEUM PRODUCT
WEST SIDE



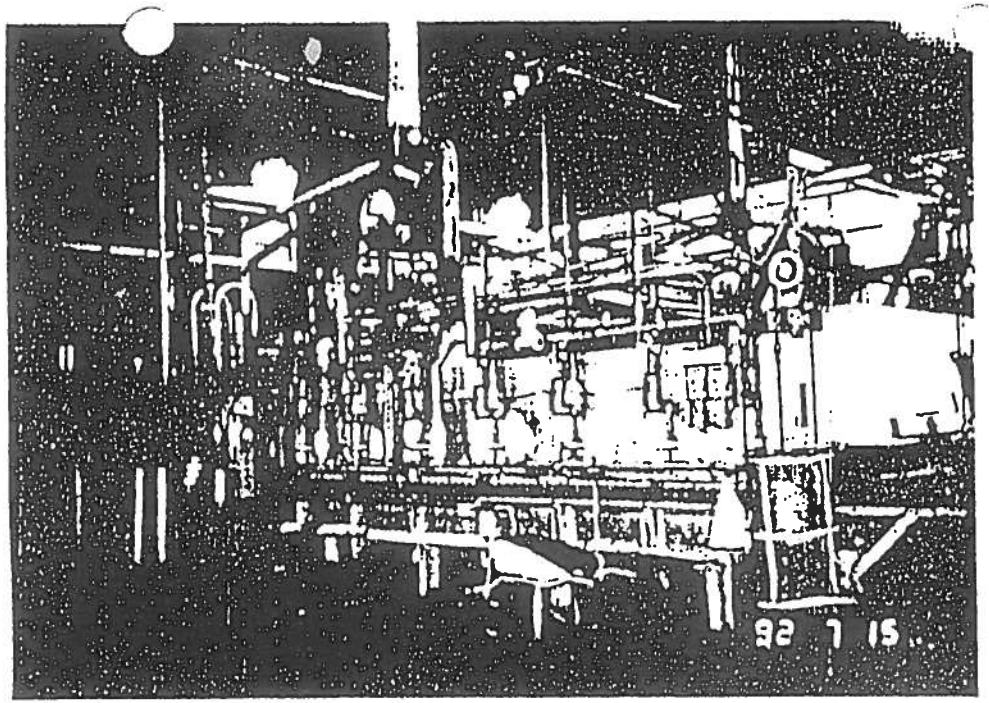
200,000–GAL. FORMER FUEL OIL TANK
EARTHEN DIKED AREA, SOUTHWEST SIDE



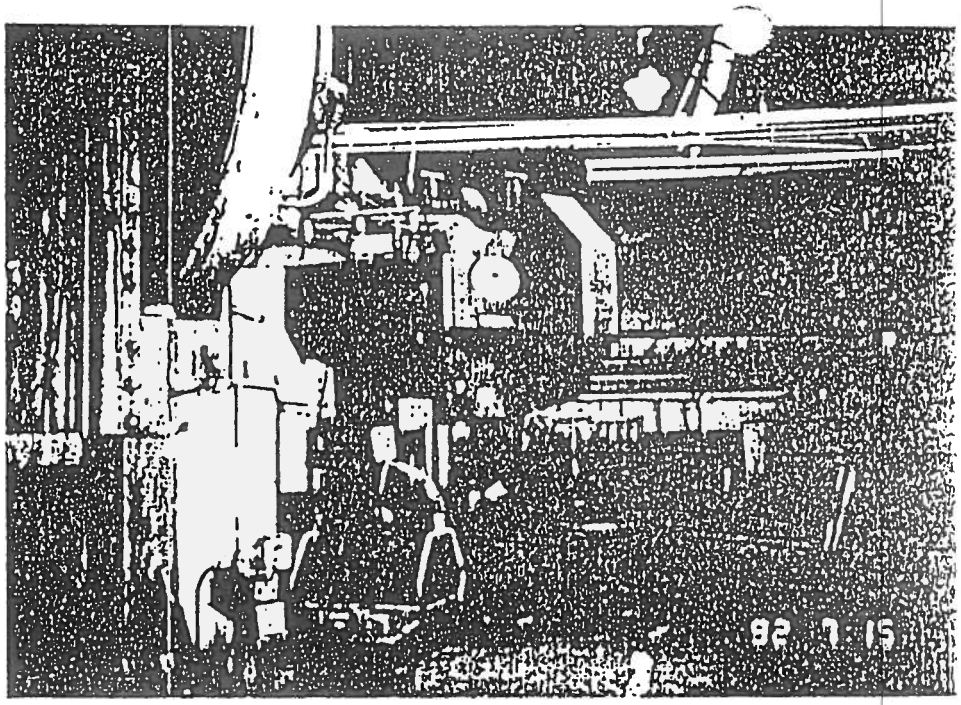
STAINED SOILS
NORTH SIDE



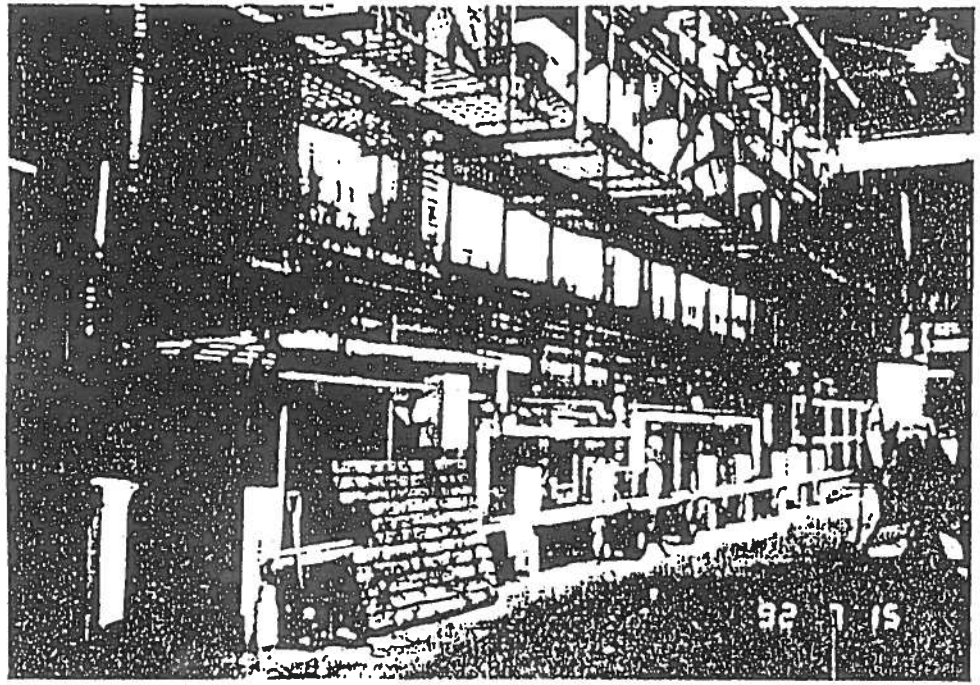
REFUSE & SCRAP STEEL STORAGE AREAS
CENTER OF PROPERTY



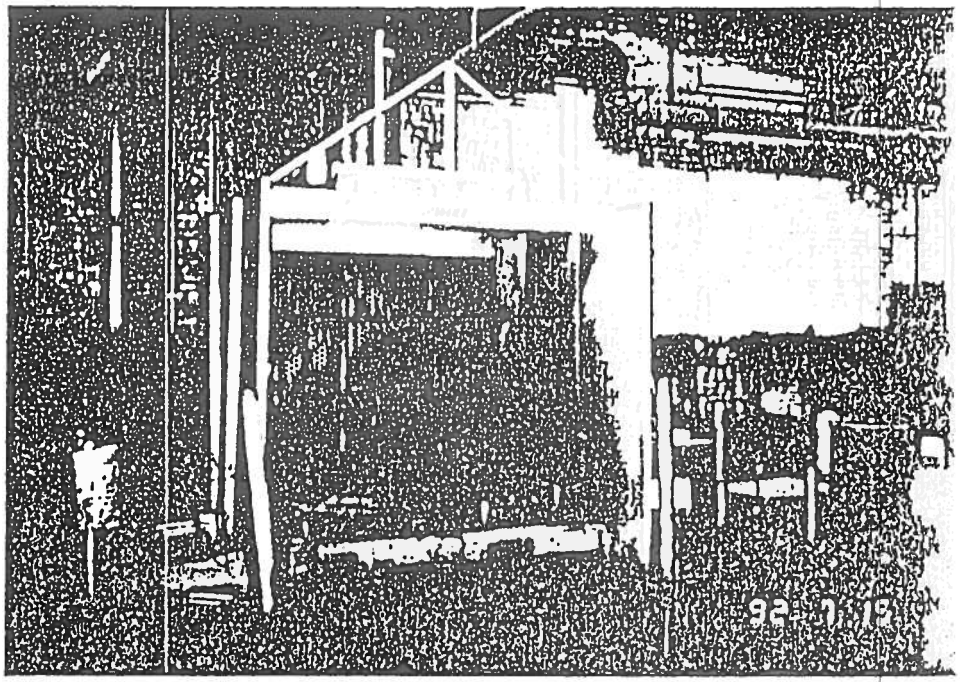
OIL HEAT TREAT TANK
DEPARTMENT 37



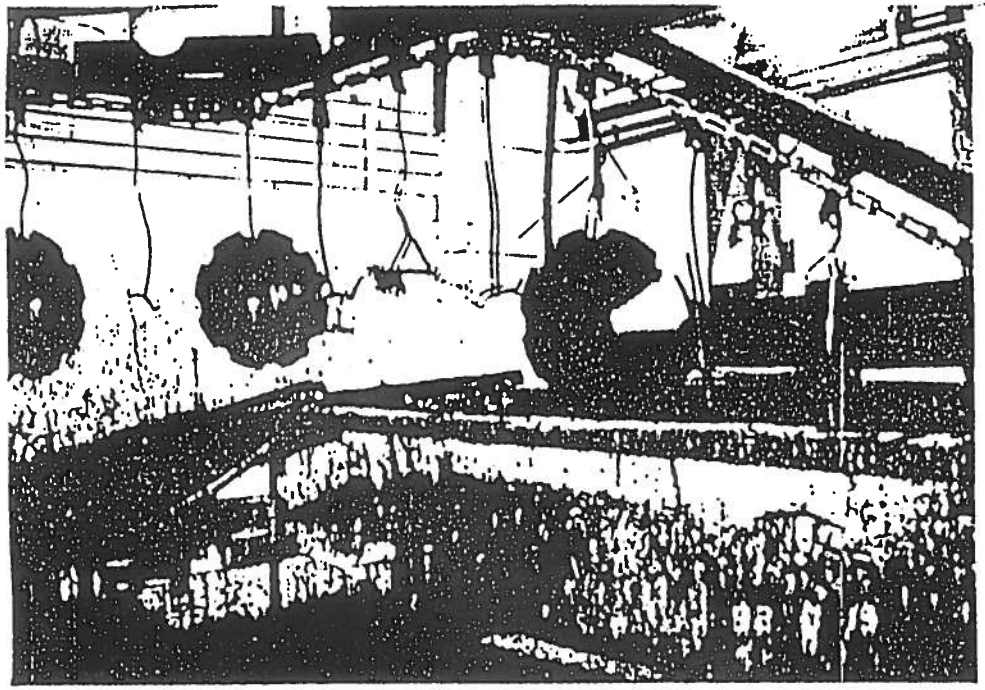
METAL STAMPING
DEPARTMENT 37



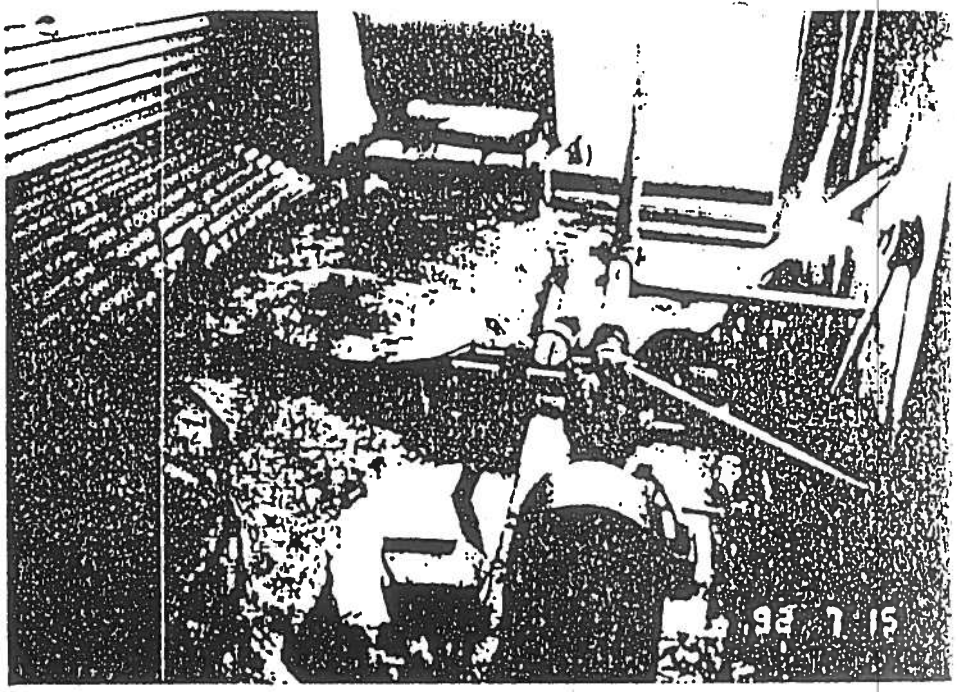
FORMER DEGREASER
DEPARTMENT 38



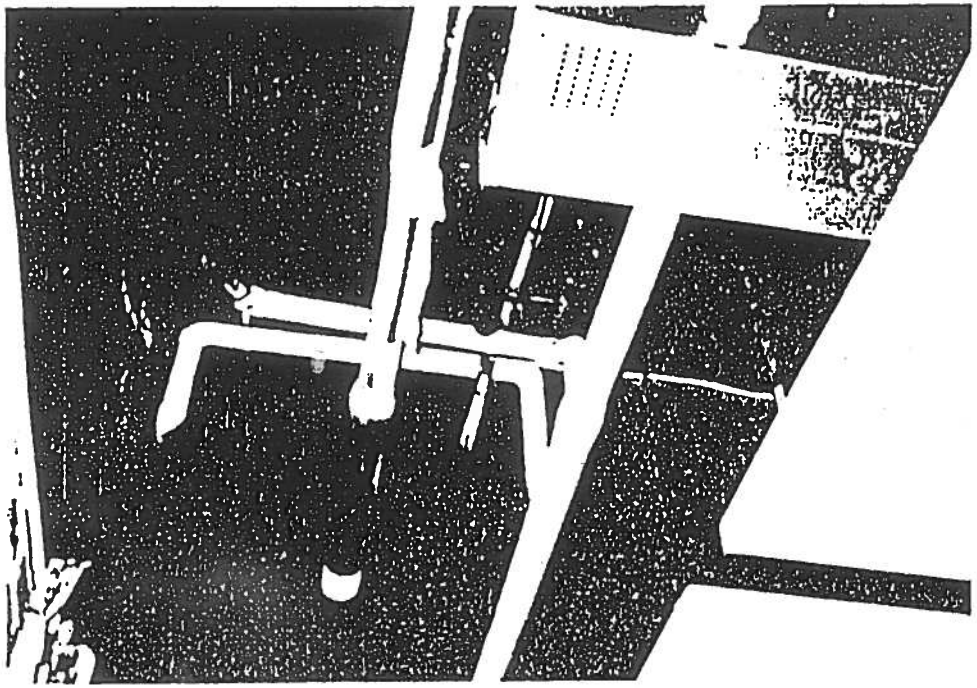
RUST PREVENTIVE SPRAY BOOTH
DEPARTMENT 16



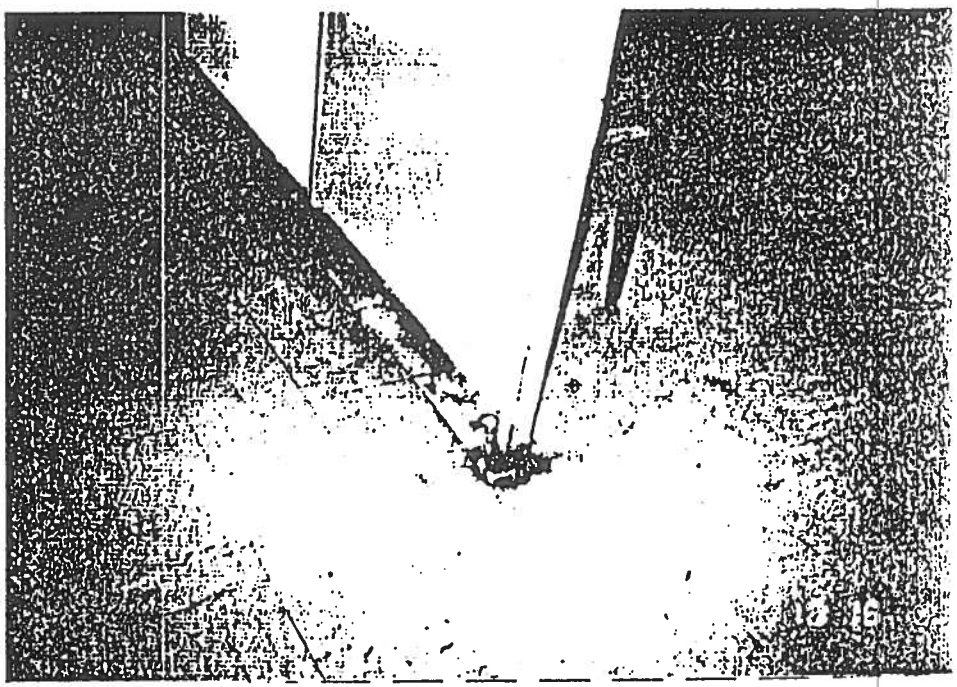
PAINT DIP TANK
DEPARTMENT 15



BELOW GRADE OIL RECYCLING TANK
DEPARTMENT 37



PIPE WRAP & ELBOW INSULATION



9" X 9" RESILIENT FLOOR TILE

DRAFT

APPENDIX B

CITY OF CHICAGO ZONING ORDINANCE

DRAFT

APPENDIX C

CITY OF CHICAGO TANK PERMITS